

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Jun 18, 2025

SEAN F. MCAVOY, CLERK

1 Richard R. Barker
2 Acting United States Attorney
3 Eastern District of Washington
4 Brandon L. Pang
5 Assistant United States Attorney
6 Post Office Box 1494
Spokane, WA 99210-1494
Telephone: (509) 353-2767

7 UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

10 4:25-CR-6023-MKD

11 Plaintiff,

INDICTMENT

12 v.

13 Vio.: 21 U.S.C. § 841(a)(1),
(b)(1)(B)(vi)
14 Distribution of 40 Grams or
More of Fentanyl
15 (Counts 1 and 2)

JAIME GARCIA and
KAYLEE LYNN GARDNER,

16 Defendants.

17 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(vi), 846
18 Conspiracy to Distribute 400
Grams or More of Fentanyl
19 (Count 3)

20 18 U.S.C. § 924(c)(1)(A)(i)
Possession of a Firearm in
21 Furtherance of a Drug
Trafficking Crime
22 (Count 4)

23 21 U.S.C. § 853
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

On or about May 6, 2025, in the Eastern District of Washington, the Defendant, JAIME GARCIA, did knowingly and intentionally distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).

COUNT 2

On or about May 29, 2025, in the Eastern District of Washington, the Defendant, JAIME GARCIA, did knowingly and intentionally distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).

COUNT 3

Beginning on a date unknown, but by on or about May 1, 2025, and continuing to June 12, 2025, in the Eastern District of Washington and elsewhere, the Defendants, JAIME GARCIA and KAYLEE LYNN GARDNER, did knowingly and intentionally combine, conspire, confederate and agree together with each other to commit the following offense: distribution of 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi), all in violation of 21 U.S.C. § 846.

COUNT 4

On or about June 12, 2025, in the Eastern District of Washington, the Defendant, JAIME GARCIA, did knowingly possess a firearm, to wit: a Glock 17 Gen 5, 9mm handgun, bearing serial number BUND128, in furtherance of a drug

1 trafficking crime for which he may be prosecuted in a court of the United States, to
2 wit: Distribution of 40 Grams or More of Fentanyl, as charged in Counts 1 and 2 of
3 this Indictment, both in violation of 21 U.S.C. § 841(a)(1), and Conspiracy to
4 Distribute 400 Grams or More of Fentanyl, as charged in Count 3 of this
5 Indictment, in violation of 21 U.S.C. § 846, all in violation of 18 U.S.C.
6 § 924(c)(1)(A)(i).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations set forth in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of 21 U.S.C. § 841 and/or §846, as set forth in this Indictment, the Defendants, JAIME GARCIA and KAYLEE LYNN GARDNER, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense(s).

If any forfeitable property, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

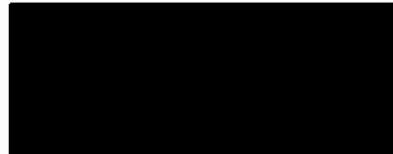
the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction of an offense in violation of 18 U.S.C. § 924(c)(1)(A)(i), as set forth in this Indictment, the Defendant, JAIME GARCIA, shall forfeit to the United States of

1 America, any firearms and ammunition involved or used in the commission of the
2 offense.

3 DATED this 18 day of June 2025.

4 A TRUE BILL
5



6
7
8
9
10 A handwritten signature of "Richard R. Barker" in blue ink.

11 Richard R. Barker
12 Acting United States Attorney

13 A handwritten signature of "Brandon L. Pang" in blue ink.

14 Brandon L. Pang
15 Assistant United States Attorney

16
17
18
19
20
21
22
23
24
25
26
27
28